

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)
BLUE GRASS ENERGY COOPERATIVE)
CORPORATION FOR PASS-THROUGH OF)
EAST KENTUCKY POWER COOPERATIVE,)
INC.'S WHOLESALE RATE ADJUSTMENT)

Case No. 2021-00105

RESPONSES TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO BLUE GRASS ENERGY COOPERATIVE CORPORATION
DATED JUNE 15, 2021

BLUE GRASS ENERGY COOPERATIVE CORPORATION

PSC CASE NO. 2021-00105

PUBLIC SERVICE COMMISSION REQUEST DATED 6/15/21

Blue Grass Energy Cooperative Corporation (“Blue Grass”) hereby submits responses to the Second Request for Information of the Public Service Commission (“PSC”) in this case dated June 15, 2021. Each response with its associated supportive reference materials is individually bookmarked.

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CERTIFICATE

STATE OF KENTUCKY)

COUNTY OF JEFFERSON)

Comes now John Wolfram, after first being duly sworn, and states that he has supervised the preparation of the responses of Blue Grass Energy Cooperative Corporation to the Public Service Commission Staff's Second Request for Information in the above-referenced case dated June 15, 2021, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



John Wolfram

Subscribed and sworn before me on this 22nd day of June 2021.





Notary ID: **KYNP10362**

Expires: **7/23/24**

BLUE GRASS ENERGY COOPERATIVE CORPORATION

PSC CASE NO. 2021-00105

RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED 6/15/21

REQUEST 1

RESPONSIBLE PARTY: John Wolfram

Request 1. Refer to TFS 2020-00337 and the report filed with the Commission on June 3, 2020 regarding the impact of changes to the demand reduction in the industrial power agreement between East Kentucky Power Cooperative, Inc.; Blue Grass Energy; and Pittsburgh Glassworks, LLC. Although there were no reported gains or losses, explain whether there is any impact on the revenue allocation that results from this agreement and whether a pro forma adjustment needs to be applied.

Response 1. The estimated impact of the agreement on the revenue allocation is negligible and no pro forma adjustment should be applied. The agreement reflects the rate switch that Pittsburgh Glassworks, LLC undertook in August 2020, from retail rate B-2 to retail rate LP-2. This resulted in a small reduction in contract demand and in annual energy usage; to illustrate scale, the energy reduction is less than one percent of the total annual energy for Rate B-2. For this reason, the rate switch has a *de minimis* effect on the determination of per-unit rates in the pass through rate calculation, and no pro forma adjustment should be applied.